

EXHIBIT 2

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CORPORAL TRINIDAD NAVARRO,)	
)	
Plaintiff,)	
)	
v.)	Civil Action
)	Number 05-565 (GMS)
CHRISTOPHER A. COONS,)	
individually and in his)	JURY TRIAL DEMANDED
official capacity; GUY H.)	
SAPP, individually and in)	
his official capacity; and)	
NEW CASTLE COUNTY, a)	
municipal corporation,)	
)	
Defendants.)	

Deposition of ALLISON TAYLOR LEVINE, taken pursuant to notice at the law offices of Margolis Edelstein, 1509 Gilpin Avenue, Wilmington, Delaware, beginning at 10:04 a.m., on Friday, March 10, 2006, before Julie H. Parrack, Registered Merit Reporter, Certified Realtime Reporter and Notary Public.

APPEARANCES:

JEFFREY K. MARTIN, ESQUIRE
MARGOLIS EDELSTEIN
1509 Gilpin Avenue
Wilmington, Delaware 19806
On behalf of Plaintiff

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919 Market Street, Suite 1401
Wilmington, Delaware 19899-1070
On behalf of Defendants Coons and Sapp

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1 APPEARANCES CONT'D:

2 MICHELE D. ALLEN, ESQUIRE
MEGAN SANFRANCESCO, ESQUIRE
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NEW CASTLE COUNTY LAW DEPARTMENT
87 Reads Way
New Castle, Delaware 19707
On behalf of Defendant New Castle County

ALSO PRESENT: TRINIDAD NAVARRO

- - - - -

ALLISON TAYLOR LEVINE,
the deponent herein, having first been duly
sworn on oath, was examined and testified as
follows:

BY MR. MARTIN:

Q. Good morning. My name is Jeff Martin. I
represent the plaintiff in this matter, Trinidad
Navarro.

I want to make sure I understand, call you
by your correct name. Should I call you Ms. Taylor
Levine, Ms. Levine?

A. Just Levine is fine.

Q. Okay, thank you.

A. Allison is even finer.

Q. Okay, thank you, Allison.

Could you give us your current address,
please?

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A. 203 Waterview Drive, New Castle, 19720.

Q. And how long have you resided at that address?

A. Three and a half years.

Q. Do you anticipate continuing to reside at that
address over the next couple of years?

A. I don't know.

Q. Okay. With whom do you reside?

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14 the County Police at some point soon after I started.
15 And I was a routinely put on cop shifts, which is just
16 part of the regular practice at the News Journal.
17 Everybody takes a turn doing cop shifts. So I would
18 communicate with Trini on reporting issues.

19 Q. How would you characterize your relationship
20 from the time you met Mr. Navarro up until the time
21 you assumed your position as communications director
22 for the County?

23 A. Friendly, casual acquaintances.

24 Q. Did you have any impression as to how well

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1 Mr. Navarro was able to do his job?

2 A. As a reporter, I thought he was very accessible
3 and always helpful, which was very important to a
4 reporter.

5 Q. Did that change during your other positions?

6 A. I don't understand the question.

7 Q. You answered that question as you were a
8 reporter at the News Journal, and I wondered if your
9 understanding of his ability changed at all as you
10 went on to other positions?

11 A. I had less interaction with Trini, I believe,
12 while I was at Public Health. It picked up again when
13 I became the department communications director,
14 because I was dealing with the Office of the Chief
15 Medical Examiner, or I was, I was the spokeswoman
16 essentially for the OCME, and we sometimes overlapped
17 on homicide cases and would communicate about those.

18 And no, it didn't change, he was still

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19 accessible and helpful and willing to work with me.

20 Q. Do you recall that Trini ever called you to
21 congratulate you as you moved along in your career?

22 A. I recall that when I received the position at
23 New Castle County, that we spoke on the phone about
24 another case related to OCME. And I told him I was

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1 going to be coming to the county, and he said yes, he
2 had heard, and he was really looking forward to
3 working with me. But I don't recall who initiated the
4 call.

5 Q. Were you looking forward to working with him at
6 that point?

7 A. Yes.

8 Q. Did that change at all during your tenure as
9 the communications director at the county?

10 A. I think that's a very broad question. Could
11 you narrow it down?

12 Q. Yeah, be happy to. You said that you were
13 looking forward to working with him, as he was looking
14 forward to working with you when you began as the
15 communications director in March of 2005. Correct?

16 A. Yes.

17 Q. Did your feeling change at all during your
18 tenure as communications director?

19 A. After I had been on the job for a while, it
20 became clear that there was some tension between the
21 executive branch, between the administration and the
22 police department, and it became more challenging to
23 work with Trini, which I did not believe was through

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24 his own fault at the time. I still found Trini to be

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1 easy to reach, willing to step up and help me. He was
2 not a direct report, as none of the PIOs were direct
3 reports to me, but he was one of the people who, when
4 I was overwhelmed, I could call and ask for help. It
5 became more challenging, but I still enjoyed working
6 with Trini.

7 Q. You mentioned that when you became overwhelmed;
8 how often did you become overwhelmed when you were the
9 communications director?

10 A. The whole position was quite overwhelming.
11 Working for Chris is very, very demanding.

12 Q. More so than you had anticipated when you
13 accepted the position?

14 A. I anticipated it, I didn't necessarily accept
15 it, I guess. The schedule that the administration
16 and -- well, that Chris and I had agreed upon was
17 tough to stick to, because he was accustomed to having
18 people available and working with him 14 to 20 hours a
19 day. And he had a lot of requirements, and I often
20 called on the other PIOs for support.

21 Q. What do you mean "he had a lot of
22 requirements"?

23 A. Chris is a very active public speaker. I was
24 writing for him between six and 10 speeches a week,

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1 plus conducting events, writing a similar number of

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2 press releases, preparing a communication strategy,
3 dealing with daily meetings, plus media calls which
4 averaged between six and 12 a day, depending on what
5 was going on in the press, and attending events with
6 Chris. And he expected a lot of a communications
7 director.

8 Q. He expected you to attend many of the events?

9 A. Yes.

10 Q. Were you aware of that when you took the
11 position?

12 A. Some of them. Not quite as many as he --

13 Q. I take it that your stipulation as to a
14 somewhat limited work schedule did not really pan out?

15 A. He allowed me to stick to the hours, but the
16 workload was more than anybody could accomplish within
17 a reasonable work schedule, which was par for the
18 course with Chris.

19 Q. What do you mean by that?

20 A. Everybody was working 16, 18, 20-hour days, and
21 still not getting everything done that Chris wanted to
22 have done, including Chris.

23 Q. All right, let me go back on a couple areas
24 that you mentioned in your answers. You talked about,

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1 I think you said a clear tension between the executive
2 branch and the police department.

3 A. Yes.

4 Q. Is that right?

5 A. Yes.

6 Q. Can you describe what you're referring to?

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7 A. Chris Coons and Dave Singleton and Lynn Howard
8 and Nicole Majeski made it very clear that they were
9 not happy with how things were going in the police
10 department. They were not happy with the chief, and
11 frequently that they were not happy with Trini. And
12 there was an active investigation into the police
13 department from the time I started, pretty much.
14 There was also the hiring of the public safety
15 director, Guy Sapp.

16 Q. What was your understanding, if any, as to the
17 role of Sapp with regard to the police department?

18 A. He was supposed to clean it up.

19 Q. Was he supposed to run it as well?

20 A. I don't know.

21 Q. And how was he supposed to clean it up?

22 A. I don't know.

23 Q. Was he supposed to get rid of the chief?

24 A. Yes.

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1 Q. And were there any plans put forth as to how
2 they would get rid of the chief?

3 A. They were trying to solidify information that
4 showed he was doing things wrong.

5 Q. Now, when you say "they," let's be clear. This
6 is the core group, meaning Coons and the four or five
7 other people that you mentioned?

8 A. Yes, it was primarily Chris, Dave Silverman,
9 and Guy Sapp, I believe, were the primary ones working
10 on that.

11 Q. Dave Silverman?

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12 A. Singleton.

13 Q. I'm sorry.

14 A. Excuse me.

15 Q. That's what I thought you -- okay. I'm sorry,
16 Allison, you said that they were trying to solidify
17 something, and I'm not quite sure what you meant by
18 that.

19 A. They had information about, or I heard them say
20 they had information about the chief's wrongdoing, and
21 they were reviewing the information to determine
22 whether it was enough information to justify
23 terminating his employment and whether it would stand
24 up to council, before council.

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1 Q. What was your understanding, if any, as to what
2 the specific allegations of wrongdoing were?

3 A. I didn't have much information about that.
4 What I heard was talk about the pay jobs fund, which I
5 don't fully understand, but it had to do with officers
6 who were paid to do jobs outside of their regular
7 duties, like directing traffic at parades and church
8 functions.

9 Q. That was your understanding as to what they
10 were talking about?

11 A. Yes.

12 Q. Did you have a further understanding that there
13 was an issue regarding an alleged DELJIS violation?

14 A. Yes, I did hear about that.

15 Q. And was this another of the grounds that they
16 were using to -- they were looking at in order to

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17 terminate the chief's employment?

18 A. I don't really know.

19 Q. All right, a moment ago when I asked you about
20 what the core group was doing, you said they were not
21 happy with the chief. We've explored some of that.
22 You said also that they were not happy with, or words
23 to that effect, I think, with Trinidad Navarro. Is
24 that fair to say?

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1 A. Correct.

2 Q. Okay. Can you tell me why, what their
3 reasoning was for not being happy with Corporal
4 Navarro?

5 A. I didn't really understand all the reasons. I
6 often said to Chris, "When there's too much going on,
7 Trini is one of the few people I can ask for help and
8 count on to get something done."

9 Q. What kind of response, if any, did Chris give
10 you?

11 A. I don't remember.

12 Q. Did it appear that Chris, like the others, was
13 upset with Trini Navarro?

14 A. Yes. They believed that he had been involved
15 in criminal activities.

16 Q. That Corporal Navarro was involved in criminal
17 activities?

18 A. Yes.

19 Q. Can you be more specific?

20 A. They believed that he had been involved with
21 campaigning on county time.

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22 Q. And this campaigning, was this the campaign
23 that resulted in the election of Chris Coons?

24 A. I don't know. I don't know.

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1 Q. Okay. You don't have any further understanding
2 as to when this campaigning may have been done?

3 A. It was, I believe it was done under the
4 Gordon/Freebery administration, but I didn't really
5 know what it, what exactly it pertained to.

6 Q. All right. Other than that, were there any
7 other allegations of criminal wrongdoing for Corporal
8 Navarro?

9 A. There were lots of rumors, but nothing that I
10 heard that was specific.

11 Q. Where did you hear the rumors from?

12 A. I don't recall.

13 Q. Did you hear any rumors from Chris Coons?

14 A. I don't recall.

15 Q. Do you recall any of the rumors?

16 A. There were some rumors that Trini had been
17 involved in a coverup in Las Vegas, but I don't
18 remember where that came from.

19 Q. Is it fair to say, though, that you heard that
20 rumor from someone in the core group?

21 A. I don't think I said that.

22 Q. I'm not sure you did. I'm asking you that
23 question.

24 A. I just don't know where I heard that from.

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1 Q. How many times did you have an opportunity to
2 speak with Chris Coons about Trini Navarro?

3 A. I don't remember.

4 Q. More than a few times?

5 A. A handful probably.

6 Q. During that time, do you recall that Chris
7 Coons ever said anything positive about Trini Navarro?

8 A. I don't remember.

9 Q. Do you recall anything that Chris Coons told
10 you about Trinidad Navarro?

11 A. He was upset on an occasion when Trini didn't
12 tell us about some media contact.

13 Q. Was that the media contact with Cris Barrish at
14 the News Journal?

15 A. I don't remember. There were several things
16 that came up. I don't remember what he specifically
17 talked about.

18 Q. You said "there were several things that came
19 up." what do you mean by that?

20 A. There were a couple of specific media items.
21 One was the story about the chief in Delaware Today.
22 There was a story about a crossing guard, Elsie or
23 Elise Poore, P-o-o-r-e, in which the chief was quoted,
24 and the Cris Barrish contact.

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1 Q. A moment ago you said that several things came
2 up. Were you suggesting they came up at one time or
3 over a course of your conversations with Chris Coons?

4 A. I don't remember.

5 Q. You believe that Chris Coons was not happy with
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9 me, near the State Hospital.

10 Q. Okay. Do you recall approximately how long you
11 met?

12 A. About an hour.

13 Q. And when was this meeting in relation to when
14 you had this telephone call with Corporal Navarro?

15 A. The following morning.

16 Q. Do you recall any of the discussion you had
17 with Corporal Navarro as of the time?

18 MS. SANFRANCESCO: I'm sorry, place an
19 objection. I just wanted to clarify one matter.

20 Earlier when this case was first filed you
21 had, Jeff, you had talked to the county attorney Gregg
22 Wilson about the fact there was no tape recording of
23 the conversation. We had sent a letter to you about
24 two days ago. I just want to confirm for the record

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1 there is no tape recording and no transcript of that
2 conversation.

3 MR. MARTIN: That's correct. And I'm
4 sorry, I believe the letter said call if there is or
5 something, and I've been in depositions, but there is
6 not.

7 MS. SANFRANCESCO: Thank you.

8 BY MR. MARTIN:

9 Q. Okay. Do you recall what was discussed at that
10 meeting?

11 A. Yes.

12 Q. Okay, can you tell us in as much detail as you
13 can recall?

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14 A. It was a very long conversation. I arrived
15 first. I had bought a muffin and something to drink
16 and sat down. I was doing some work while I was
17 waiting for Trini. And he arrived, and I asked him if
18 he wanted to get something to drink or eat. And he
19 said no, he had a knot in his stomach because he was
20 so upset. And he was talking about the sergeant
21 promotion. He was afraid he wasn't going to get
22 promoted because the number of positions for sergeant
23 had been reduced.

24 And I didn't really understand -- at that

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1 point I didn't know that sergeant was the next step.
2 I didn't understand the process, so I did not really,
3 I think until that day, understand that you went from
4 corporal to sergeant. I had overheard somebody
5 talking earlier in the week or the month about a
6 number of positions being changed, but I didn't really
7 know what it meant.

8 Q. When you say you overheard someone, are you
9 talking about within the core group?

10 A. I don't know.

11 Q. And was there any explanation given for the
12 number of openings being changed?

13 A. I don't know. I heard, just in passing I
14 think, somebody saying the number was changing.

15 Q. But you don't recall who that was?

16 A. No.

17 Q. Okay. Did you relay that to Corporal Navarro
18 during your meeting?

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19 A. I don't remember.

20 Q. Okay.

21 A. I might have said that I had heard something
22 was changing, but I don't -- I didn't know any more
23 than that, so I wouldn't have said any more than that.

24 Q. Okay. What else did you discuss?

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1 A. We went on to talk about the promotions for a
2 while, because Trini was explaining to me the process
3 and the number of candidates. And at some point I
4 said, "Well, the decision hasn't been made yet, right?
5 So you could still get this." I think I was
6 encouraging him not to worry about it until the
7 decision was made.

8 And he was explaining to me that there was
9 an African-American man, I think his name was John, or
10 John Wagner, something like that, who he felt was
11 going to get that promotion rather than him because
12 the guy was an African-American man who had not
13 received a promotion previously.

14 So I asked about when the next time would
15 be, even if he didn't get it on this occasion, which I
16 didn't take as a definite yet, when would the next
17 time be that he could be considered for a promotion.
18 And I don't remember what the answer was to that, but
19 it was something he wasn't happy about. He didn't
20 want -- that wouldn't work for him for some -- I can't
21 remember if it was the tests didn't -- I don't know
22 what the reason was. But that wasn't good.

23 So I inquired about some other options.

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24 Q. Did you say at some point that you felt he had

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1 a good chance of being promoted because of his strong
2 years as a PIO?

3 A. I don't remember. I didn't know if he had a
4 good chance or not.

5 Q. Go ahead, I'm sorry to interrupt you.

6 A. At some point he said that he just wanted to be
7 promoted. He wanted to be out of the PIO position.
8 And he was convinced he was not going to get this
9 promotion.

10 So I said, "well, you know, if you really
11 want to just get out of that position, then what are
12 the other options?" Because I didn't know. I asked
13 some questions about whether it was possible to move
14 laterally. He said that it would be embarrassing. He
15 said that never before had a PIO left the PIO position
16 without being promoted, and to do that would be a slap
17 in the face if he had to leave the PIO position
18 without being promoted to sergeant.

19 And I inquired about other options,
20 because he was saying he was really unhappy. And I
21 didn't know what the other possibilities were, so I
22 asked some questions about whether he could -- if it
23 would work -- if he even wanted to stay in the police
24 force, if he wanted to move to another part of the

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1 county, if he wanted to still be a police officer but
2 could he go to the state or city. I just was asking

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3 what the options were.

4 And he explained to me that there was the
5 county, he had -- he was close to having his
6 retirement and he could not change without interfering
7 with his timing for retirement.

8 Q. So he told you that he wanted to get out of the
9 position as PIO?

10 A. Yes. And he said he didn't really -- he said
11 he just wanted to be promoted. He just wanted to be
12 back on the street. He recognized that it was a plum
13 job, that he could be at home with his family, he had
14 a baby, he could be at home with her more. But it was
15 just too much. He'd been in there too long, it was
16 too hot between the political stuff. So that's when I
17 was asking about the other options.

18 Q. Do you recall suggesting to Trini that he might
19 want to transfer out of that PIO position to another
20 position?

21 A. I asked if it was something he would want to
22 do.

23 Q. Okay. Do you recall saying something to the
24 effect that it would be good to transfer so that

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1 you're not being labeled as being on a particular
2 team?

3 A. I think I said maybe would he be more
4 comfortable. I think I was posing it as a question,
5 would he be more comfortable in a position that was
6 less in the midst of the political stuff. Because
7 that's what he was most concerned about.

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8 Q. And you knew that the politics issue was
9 important to his career, did you not?

10 A. I didn't know what impact it had on his career.
11 I knew that from what he said that he was unhappy in
12 the position because of the politics.

13 Q. Did you tell Trini during that meeting that the
14 county executive did not like him?

15 A. I don't recall.

16 Q. Do you recall stating that Trini would be on
17 the losing team if he continued to stay on the
18 McAllister team?

19 A. I remember saying that the chief was going to
20 lose. I don't remember if I said the "McAllister
21 team" or not.

22 Q. And what did you mean by McAllister will lose?

23 A. I believed that the chief would ultimately
24 either resign or be removed from his position. During

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1 that conversation -- should I continue?

2 Q. Please.

3 A. Trini also told me about his grand jury
4 testimony. He said that his attorney had advised him
5 that he had not participated in any illegal
6 activities. He told me that he had done some
7 campaigning on county time and in uniform, primarily
8 soliciting help from other police officers. And this
9 came up because we were talking about the negative
10 rumors that surrounded the chief and him, the chief
11 and Trini. And he volunteered, he said, "I'll tell
12 you exactly what I told the grand jury." And he told

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13 me what things he did. And he said that his attorneys
14 had told him he hadn't done anything wrong, anything
15 illegal.

16 Q. When you met with Trini at the Dunkin' Donuts,
17 did you talk about the rumors regarding his
18 involvement in an investigation of a murder in Las
19 Vegas?

20 A. I told him -- he asked me specifically what
21 negative rumors were there about him. And I said
22 something along the lines of, "I hope to God it's not
23 true, but this is one of the rumors I'm hearing, that
24 you were actually in Las Vegas." And I asked him, I

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1 said, "Could you just tell me personally, you know, if
2 it's not true, tell me it's not true and I'll believe
3 you and we'll put it away. I'll never worry about it
4 again."

5 And he said it was not true. I told him I
6 wanted to trust him and that there were just these
7 things floating around out there that I wanted to know
8 the answer to.

9 Q. When you and Trini talked about the process for
10 selecting a sergeant and the process for having
11 openings, do you recall making a statement to the
12 effect that, "well, that's how politics works"?

13 A. I don't remember making that statement in that
14 context. I may have used that turn of phrase, but I
15 don't believe that politics plays a role in the
16 promotion process, so I don't think I would have said
17 that in that context.

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18 Q. Do you recall telling Trini at the time you met
19 at the Dunkin' Donuts that you had several
20 conversations with chief -- or the county executive
21 and that you had told Chris Coons that Trini is one of
22 the few people who you can depend upon to get the job
23 done?

24 A. Yes.

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1 Q. Do you recall telling Trini during your meeting
2 that you felt that he had done an excellent job with
3 the media going back to the days when you were with
4 the News Journal?

5 A. Yes. I don't know if I said it on that
6 occasion at the Dunkin' Donuts, but I know I said it
7 to him at some point or another.

8 Q. Okay. You told us previously I believe about
9 Chris Coons saying that he did not like Colonel
10 McAllister. Is that correct?

11 A. Yes.

12 Q. Do you recall that Annie Coons did not like
13 Colonel McAllister?

14 A. I never spoke directly with Annie about that.

15 Q. Did Chris Coons tell you that his wife did not
16 like McAllister?

17 A. I remember that I knew that Annie did not like
18 him. I don't remember whether I heard that, though.

19 Q. And was it simply a do not like, or were there
20 stronger words used?

21 A. I don't remember.

22 Q. Do you recall Chris Coons saying at one point

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23 or another that Corporal Navarro will never be
24 promoted?

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1 A. No, not at all. I recall reporters from the
2 News Journal calling me to tell me that Trini told
3 them that.

4 Q. That Trini told the reporters what?

5 A. That I said that Chris said he would never be
6 promoted as long as he was county executive. But I
7 definitively did not say that.

8 MR. MARTIN: Okay, off the record a
9 moment.

10 (Discussion held off the record.)

11 BY MR. MARTIN:

12 Q. All right, Allison, I want to pick up,
13 following the meeting that you had with Trini Navarro
14 on or about June 29, 2005, did you have any further
15 contact with Trini Navarro?

16 A. I had some routine dealings, but I don't recall
17 specific issues or conversations.

18 Q. All right. Did you tell anybody about your
19 meeting with Trini Navarro on or about June 29?

20 A. I told -- I had told, before I went, I had told
21 somebody in the executive office, I don't know if it
22 was Chris or Dave Singleton.

23 Q. Before you went to the meeting with --

24 A. Yes, I told them I was going to meet with him

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1 because he was upset and wanted to talk.

2 Q. And you're not sure who you told, it was either
3 Chris or Dave or someone else?

4 A. It was, it was either Chris or Dave, but I
5 don't remember who.

6 Q. Was there any response from that individual as
7 to --

8 A. "Just be careful."

9 Q. Okay. What did you understand that to mean?

10 A. They didn't trust Trini.

11 Q. And these were the reasons that you had
12 previously set forth, or were there other reasons?

13 A. I think -- I don't know. I don't know why. I
14 don't know other reasons why.

15 Q. All right. And how long did you continue to
16 work at the county?

17 A. Until the day I was fired. I think it was
18 August 9th, approximately.

19 Q. And by whom were you fired?

20 A. Dave Singleton, at the request of Chris Coons.
21 Lynn Howard was also in the room.

22 Q. Was Chris Coons not available that day?

23 A. He was not there. I don't know where he was.

24 Q. What was discussed?

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1 A. I had -- that was a Tuesday. I had been off on
2 Monday, which was previously scheduled because my
3 parents were in town. I had been doing some work in
4 the morning. I was called in, Dave Singleton asked me
5 to come into his office, and Lynn Howard was there.

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20 you not to trust him, you were going on a one-on-one
21 meeting, and perhaps in hindsight their advice was
22 right.

23 A. Is that a question?

24 MR. MARTIN: It's more of an argument, I
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1 think.

2 Q. Well, thinking back on it, is that -- yeah,
3 there's no way to frame that a question.

4 A. You could make that argument about working for
5 Chris Coons, too, couldn't you?

6 MR. GODDESS: I'll withdraw the question,
7 good objection. Keep the record going formal.

8 I have nothing further. Thanks.

9 BY MS. SANFRANCISCO:

10 Q. Allison, I just want to clarify something for
11 the record. When you had that conversation with Al
12 Mascitti about what you had allegedly said to Corporal
13 Navarro, did you tell Mr. Mascitti that you had, in
14 fact, never said that?

15 A. Yes, I did.

16 Q. Okay. You also talked earlier about the fact
17 that Chief McAllister instructed Corporal Navarro not
18 to tell you about certain media events. Do you recall
19 that conversation? Do you recall us talking about
20 that here at the deposition?

21 A. Yes.

22 Q. Okay. Do you have any idea as to why the chief
23 instructed Corporal Navarro not to tell you about
24 certain media events or media events in general?

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1 A. I could speculate.

2 Q. I want you to tell me what your understanding
3 is as to why.

4 A. My understanding is that the county executive
5 and Chief McAllister were engaged in a vicious pissing
6 match, and neither of them wanted to give the other
7 any opportunity to look good, including in the media.
8 And the chief wouldn't want Trini to tell me about
9 these media stories because it would give Chris, the
10 county executive, the opportunity to either chime in
11 on the media stories or stop them.

12 Q. And did Corporal Navarro ever relate to you
13 that that was, in fact, what was going on on Chief
14 McAllister's part?

15 A. We discussed a couple of times that there was a
16 clear pissing match going on between the chief and the
17 county executive. But we didn't -- he never said
18 that's what the chief's doing.

19 MS. SANFRANCISCO: Nothing further.

20 BY MR. MARTIN:

21 Q. I have a couple of follow-ups, Allison, very
22 few, I'm pleased to say.

23 You answered Mr. Goddess with regard to
24 the promotional issue and made a statement something

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1 to the effect that a fewer number of sergeants were
2 needed, instead they wanted to increase the number of
3 patrolmen, men on the street, or police officers on
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4 the street. Is that --

5 A. I think that was what it was.

6 Q. All right. Do you know from whence that came?

7 was this county policy or --

8 A. I don't remember.

9 Q. But you heard this during your tenure as the --
10 at the county you heard them, you heard somebody say
11 that this is what they wanted to do, increase the
12 number of patrol officers on the street and therefore
13 fewer number of sergeants would be needed?

14 A. I believe so.

15 Q. Okay.

16 A. That was my, my general understanding.

17 Q. Okay.

18 A. Of why the number of sergeant positions was
19 reduced.

20 Q. All right. And the time period was at the end
21 of the fiscal year going into fiscal year, or the new
22 fiscal year July 1?

23 A. I don't really recall the specific timing.

24 Q. Okay. You also reference some meetings with

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1 PIOs, the PIOs that may not have been your direct
2 reports but were also county PIOs, you enumerated
3 seven or eight of them, correct?

4 A. Correct.

5 Q. Isn't it fair to say that you, a couple of your
6 meetings, if not more, the purpose was to develop
7 plans as to how to cover or react to the upcoming
8 Gordon/Freebery trial?